

**FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS**  
**June 12, 2000**

**Intermediaries**

**Program Management**

Bills Payment  
Appeals/Reviews  
Inquiries  
Provider Education and Training  
Reimbursement  
Productivity Investments

## **FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT**

### **Bills Payment (Intermediary)**

The following is a list of major activities related to Bills Payment. This should not be construed as an all-inclusive list of tasks. Intermediaries should continue to budget for all activities currently performed. If there is a significant activity that you perform that is not listed below, please add a statement in your narrative justification describing that activity.

#### **BILLS PAYMENT ONGOING - Activity Code 11001**

The Bills Payment BPRs for FY 2001 relates to HCFA's goal to promote sound financial management and fiscal integrity of HCFA programs.

##### **Receipt, Conversion and Control**

Include the cost related to receipt of initial bills and adjustment bills. (Do not include mailroom or control costs associated with the receipt of medical information or MSP development.)

- o Receiving Hard Copy Bills - The process includes the following actions: sorting mail; opening envelopes; extracting claims; sorting claims by type; stamping control numbers; microfilming bills; copying microfilm; checking bills for all necessary data elements; batching and keying bills; scanning or imaging bills; filing paper bills; directing keyed output to appropriate magnetic media; and scheduling bills for processing.
- o Receiving Electronic Media Bills - The process includes the following actions: controlling claims received via electronic media; providing ongoing support to electronic billers and their system vendors or billing agents as needed to enable them to maintain their billing software and submit electronic billing data in the proper format; subjecting claims to front-end edits; scheduling claims received for processing and storage or return to sender; capturing on-line data; spooling on-line data to storage media, and scheduling on-line data for processing; acknowledging all electronic bill receipts; and returning claims failing front-end edits to the provider for correction and resubmission.
- o Maintenance of Necessary Support Systems - Include the costs of maintenance of systems for electronic data interchange (EDI) activities and transactions other than EMC. Charge this cost and that of maintenance of systems to support EDI requirements, including related telephone lines and telecommunications hardware to EDP and allocate it to all appropriate functions. Where it is possible to allocate all of the costs for some subset of EDP costs (e.g., on-line direct data entry costs), allocate them to the identified function. Refer to MIM Part 3, Sections 3508, 3601-3602, and 3750-3751.

##### **Notices of Utilization(NOU)/Explanation of Medicare Benefits/Medicare Summary Notices (EOMB)**

- o Program Memorandum Intermediaries/Carriers, Transmittal No. AB-99-3, dated February 1999, Change Request 756, replaces all previous instructions and requires contractors to send EOMBs/MSNs in all instances except for the following claim types: Laboratory, Demonstrations, Exact Duplicates, and Statistical Adjustments. These four types of claims still require suppression of notices.

##### **Editing**

Include the cost related to routine editing of bills: (Do not include edits performed for specialized purposes such as Medical Review/Utilization Review and Medicare Secondary Payer.)

- o Editing Bills - The process includes both data verification for accuracy and performance of edits for consistency, provider eligibility, validity of provider ID, and validity of diagnostic and procedure coding.
- o Special Edits - Bills are subjected to special edits designed to suspend bills by bill type or from targeted providers. Special edits also suspend bills based on procedures for PRO prepayment review.

#### Processing

Include only costs related to routine bills processing.

- o A payment method and payment rate are obtained for each provider file. If applicable, the PIP indicator is set. For PPS claims, the appropriate GROUPER is called and the output is forwarded to Pricer. For other PPS claims, appropriate fee schedules and pricers are used.
- o Duplicate checking is performed for each claim.
- o Re-entry of corrected/developed claims which pend from the system is accomplished.

- o Pay bill appropriately and calculate payable amount.
- o PROBILL is created and sent to the PRO and error notice is sent to PRO if adjustment request cannot be attached to original claim.
- o Claims processing application programs are utilized.

#### Common Working File (CWF)

Include costs for activities required for complete and accurate storage, preparation, and processing of data sent to and received from CWF.

#### Quality Control

Include costs related to routine quality control techniques used by management to measure the competency and performance of bill processing personnel.

#### Bill Service

Include all costs related to:

- o Filing, removing, updating, refiling and general maintenance of electronic and paper bill files.
- o AHelp desk personnel as made available for all above tasks as necessary.

#### Coordination of Benefits (COB)

Contractors are to continue the solicitation of agreements for the purpose of crossing paid claims data to health care insurers. Contractors are to continue to cross over Medicare paid claims data to their existing trading partners, and to collect the fees in accordance with MIM 1601.

#### Payments and Remittance

Include the costs of producing a check or EFT payment and remittance advice (Refer to MIM, Part 3, Sections 3601-3602, 3750-3751) and Medicare Summary Notice.

#### Paper/Manual Data Interchanges

Plan to modify the standard format for paper remittance notices and to distribute an updated PC-Print once a year. Modifications in the electronic standard for remittance advice transactions could require accompanying changes in the standard paper format and the PC-Print. (See EDI section of BPRs and MIM, Part 3 sections 3750-3751; standard paper format specifications are released in tandem with electronic format version specifications or manual instructions when a paper format change is needed. Revised PC-Print software is issued as appropriate by the shared system maintainer in conjunction with the electronic system changes that underlie the need for the change.)

In FY 2001, we expect that contractors will make system changes for implementation of the national transaction standards for EDI as required under the Health Insurance Portability and Accountability Act (HIPAA) of 1996. A new PC-Print will also need to be prepared. Although not currently anticipated, some revision could also be needed to the paper remittance format at that time.

#### Fee Schedules

Include the costs of maintaining and updating fee schedules, which may include systems changes.

## Electronic Data Interchange (EDI) Support

EDI supports a variety of the functions listed above. Also, note that some work listed in this EDI section represents work that should be construed as discretionary, which  $\text{A may}\equiv$  be adopted as a best practice if cost effective.

HCFA defines EDI as the fully automated transfer of data between a biller (provider or agent) and Medicare for billing, remittance advice, eligibility query/response, claims status query/response, claims development request/response, and other purposes in lieu of an otherwise manual claims processing related activity, or between Medicare and a bank for electronic funds transfer or remittance advice, or between Medicare and another payer for coordination of benefits. To be considered EDI for workload reporting purposes, data must be transferred in an automated fashion, without the need for routine manual intervention. EDI requirements are defined in Medicare Intermediary Manual (MIM) Part 3, Sections 3601-3602 and Addendum A to section 3600, and in the EDI standard format implementation guides as issued by HCFA and published on the HCFA web page [www.hcfa.gov/medicare/edi/edi.htm](http://www.hcfa.gov/medicare/edi/edi.htm) or in implementation guides published at [www.wpc-edi.com](http://www.wpc-edi.com) which HCFA directs its contractors to implement in compliance with HIPAA.

Discrete EDI activities:

Establish and support EDI connections as required for Medicare.

- a. Conduct outreach activities with providers to educate them on and expand their use of the EDI transactions supported by Medicare. Outreach should include training for provider staff in submission of claims electronically using Medicare billing software (if selected by the provider) and use of PC-Print software, provision of information on potential EDI vendors, and information on and the advantages of use of each of the EDI standards supported by Medicare.

(NOTE: Questions were raised as to which outreach costs should be applied to the Provider Education and Training (PET) function and which to EDI/Bills Payment. The Program Management-Provider Education and Training (PM-PET) function covers the education of groups of providers, rather than contacts with individual providers. PM-PET costs would include newsletters, and classes or outreach to providers and their staff on Medicare coverage, billing and benefits of EDI in general, but would not cover costs to interact with individual providers to establish their connectivity for EDI, to resolve problems maintaining that connectivity, to exchange EDI transactions, to otherwise interact individually with a provider on EDI-related activities, or to interact with vendors/clearinghouses for the transfer of EDI transactions. Although EDI-specific support is generally supplied by EDI staff, rather than PET staff, that may vary by contractor. To the extent that PET staff of a particular contractor may also furnish specialized EDI support, the proportion of their time spent furnishing EDI support to individual providers should be charged to Bills Payment.)

- b. Acquire and maintain telecommunication protocols and lines, and software and hardware for the receipt and issuance of electronically transmitted batch transactions in a secure manner, and hardware for the processing of magnetic tapes delivered by trading partners.
- c. Prepare, maintain and distribute free Medicare electronic billing PC software and specifications, when requested by trading partners, and distribute PC-Print software (prepared by the standard system maintainer for pre-HIPAA and the HIPAA remittance advice versions) to electronic trading partners on request.

(NOTE: Intermediaries must furnish free/at cost Medicare billing software to providers on request for pre-HIPAA claim versions as well as for the HIPAA claim version when implemented. Pre-HIPAA versions of the billing software are included in Bills Payment. Since significant changes will need to be made for the HIPAA version of this software, development and distribution of the initial HIPAA version of this software is addressed in the PI section. )

- d. Conduct system testing with electronic trading partners to assure compatibility between systems for successful exchange of data.
- e. Obtain an EDI Enrollment Form from each provider prior to electronic transfer of data and issuance of system passwords/billing numbers to protect the security of transferred data.
- f. Use the Medicare standard ASC X12 997 for automated confirmation of receipt of electronic X12 transactions. Use the Medicare standard flat-file functional acknowledgment for confirmation of receipt of electronic flat files. (See MIM, Part 3, Section 3602.3).
- g. Edit data received from trading partners for compliance with system requirements and format specifications.
- h. Route edit and exception messages, claim development messages and remittance advices automatically to electronic trading partners via direct transmission or via deposit to an electronic mailbox for downloading by a trading partner.  
(NOTE: A Medicare intermediary is responsible for the cost of delivery of this information. Electronically, this includes the cost of generating the data, transmission to an electronic mailbox or direct to the biller's computer, and the cost of the electronic mailbox where data may be stored pending downloading by the biller. An intermediary is not responsible for the costs of data transportation between the mailbox and the biller.)
- i. Maintain capability for submission of EDI transactions in batch, for batch correction of edits, and batch submission of adjustments by electronic trading. A Batch means the submission of data accumulated over a period of time which is processed sequentially by the receiver in a subsequent computer system run with the results of processing relayed back to the submitter after completion of that run.
  - + As current system capabilities allow, an intermediary may issue batch requests for and/or receive structured claim attachments electronically. This is not required, and supplemental funding will not be provided to add this capability where it does not currently exist (prior to HCFA-directed implementation of the HIPAA attachment standard implementation guide, this is discretionary), but it is permitted as an EDI activity where the capability already exists. Separate funding will be provided for implementation of the HIPAA transaction for attachments as a Productivity Investment upon publication of the implementing regulation.
  - + As current system capabilities and formats allow, an intermediary may use online or fast batch processes for submission of claims, claims adjustments, attachments, and correction of edits. A Online means interactive processing of data upon receipt and immediate relaying of the results of the processing to the submitter. A Fast batch means the receipt of data accumulated over a period of time that is processed typically in less than a minute after receipt, for which the results of processing are relayed back to the submitter immediately upon completion of processing. Intermediaries are not required to maintain online or fast batch capability, and will not be funded to establish such capability where it does not already exist. This is considered a discretionary capability, but use of online and fast batch processes is permitted where the capability does already exist.
  - + As current capabilities allow, an intermediary may maintain batch capability for receipt of and response to claims status requests. Intermediaries are not required to have this capability and they will not be funded to add this capability where it does not already exist (prior to HCFA-directed implementation of the HIPAA standard implementation

guide for claim status inquiries and responses, electronic claims status and response capability is considered a discretionary activity). However, intermediaries who may possess this capability are permitted to use it as an EDI activity.

- + As intermediary system capabilities and formats allow, support online or fast batch receipt of and response to EDI eligibility inquiries (prior to HCFA-directed implementation of the HIPAA standard implementation guide for eligibility inquiries and responses, this capability is considered discretionary).
- j. Verify the validity of the EDI data received from electronic trading partners through selective audits and use of other verification tools.
- k. Make skilled staff available to provide EDI support as needed to maintain connections with electronic trading partners.
- l. Furnish providers and their clearinghouses/agents with at least 60 days advance notice of system changes that will impact the EDI transactions they send to or receive from Medicare. Depending on the extent of changes, issue notices or provide educational programs to facilitate implementation of the changes or new standards by your trading partners.

Retain, or be able to recreate, all electronic transactions that were used to process claims, update claims or provider history files, or to issue remittance advices, electronic query responses, or to conduct any other transaction electronically with a trading partner in accordance with requirements in Intermediary Manual, Part 2, Section 2982.

As intermediary system capabilities allow, support electronic receipt of provider appeal requests. (As part of an appeals enhancement demonstration project, a small number of contractors were allowed to use a local format for receipt of electronic appeals requests from providers. Although this project was not extended nationally, and no national format exists for electronic appeal requests, those contractors who currently have this capability may continue to use it. Funding will not be provided to add this functionality where it does not already exist. This is a discretionary activity.)

Retain statistics on EDI performance to support workload reporting and monitor the effectiveness of your EDI marketing activities. (NOTE: At the current time, this entails collection of EMC data for the monthly workload reports, but HCFA expects to expand CROWD reporting at some future date to add performance tracking for EFT, paper and electronic remittance advices, electronic eligibility queries and responses, and other EDI transactions. Intermediaries will be issued specific manual instructions and related funding as a productivity investment, when such changes are made.)

The shared system maintainer(s) and intermediaries must make system changes as needed to update each of the already implemented and HCFA-supported standard electronic formats, including for COB, claims, and remittance advices once a year if so directed by HCFA.

- a. Implement new reason codes, remark codes, HCPCS, and other code additions/changes issued during the year for use in the supported EDI formats.

Maintain quality assurance procedures to validate the effectiveness and accuracy of the EDI process.

- a. Utilize EDI compliance software (also referred to as Standards Enforcement Software [SES]) when issued by HCFA for self-diagnosis and correction, if necessary, in conjunction with your shared system, of your ASC X12 EDI programming.
- b. Use self-maintained quality assurance tools for validation of other EDI transactions you may support in a local format which have not been nationally standardized or implemented by Medicare.

**EDI costs do not include:** the use of fax or optical character recognition (OCR) technology for the receipt of claims data, attachments, inquiries, or other transactions (although these costs may be attributable to receipt of data classified as hard copy); purchase, operation, mapping to or maintenance of software for the use of data received in a non-standard format; purchase of claims data from a clearinghouse or other source (except as part of COB when Medicare is the secondary payer); any share of the costs of a clearinghouse or other service organization established by an umbrella organization which owns or has authority over a Medicare intermediary; or any costs involved with activities not specifically permitted by HCFA as related to EDI. Medicare cannot subsidize the costs of a potentially for profit entity operated or controlled by an intermediary's parent organization, just as it cannot subsidize the costs of clearinghouses that are not associated with a Medicare contractor.

A Medicare intermediary's reimbursement is limited to reasonable, allowable, and allocable costs in performance of the functions specified in its Medicare contract. Medicare may not pay for more than its pro-rata share of the indirect, general and administrative costs related to overhead shared with any parent company of the intermediary.

By virtue of its relationship with or control of a Medicare intermediary, an intermediary's parent company has no inherent right for itself or for any clearinghouse or other entity which it also controls, to read, use or manipulate data received that is intended solely for Medicare use. A clearinghouse owned or controlled by a parent company is subject to the same restrictions on use of Medicare data that apply to any other clearinghouse. No clearinghouse may retain Medicare data for longer than required to successfully reformulate that data into a format acceptable by Medicare or another payer or to transmit that data to the correct payer. Nor may a clearinghouse sell or share data received for or from Medicare (except insofar as required for COB), beyond general statistical data on the number and types of records received, generate reports involving the content of that data, or use the data for any purpose not specifically permitted by Medicare.

#### Security

Intermediaries are required to adhere to the systems security policy/procedure outline in the Medicare Intermediary Manual, Part II, Sections 2972-2976 and the Internal Revenue Service's Tax Information Security Guidelines (IRS Safeguard Activity Procedures). The policy is designed to protect Medicare assets, Medicare data and systems at the contractor sites. Activities include but are not limited to establishing and maintaining systems security controls for the data centers, LANs, WANs, systems software, application programs, operating systems, and data storage facilities.

The contractors shall establish and maintain a Contingency Plan and Exercise on an annual basis (Medicare Intermediary Manual, Part II, Section 2974{f}). The survival of the Medicare Program is contingent upon the development of comprehensive emergency procedures. In the event of a crisis, the emergency procedures must be activated promptly and at short notice in order to minimize the impact of a disruption to the Contractor's critical business functions.

The contractors shall establish and maintain a risk analysis every three years (Medicare Intermediary Manual, Part II, Section 2974{e}). The risk analysis shall consider scenarios that could cause an impact on the contractor Medicare assets. The contractor must describe the Medicare operations, identify vulnerabilities to the Medicare operation and determine the cost measures necessary to mitigate vulnerabilities.

#### Workload

Bills Workload, Activity Code 11001, (Workload 1 in CAFMII) is the cumulative number of bills processed as reported on Line 12 of the Intermediary Workload Report, Form HCFA-1566.

#### **PROVIDER ENROLLMENT (Activity Code 11006):**

The Provider Enrollment (PE) Budget and Performance Requirements (BPRs) reflect the objectives and priorities of the Medicare Program. The goals of provider enrollment are to properly enroll all providers through the use of the

Medicare General Enrollment Application, Form HCFA-855, and to:

- o Ensure that Medicare billing privileges are granted to and retained by only those organizations that have enrolled in the Medicare program and have proven by the information provided and verified that they are responsible and accountable business partners.

The Contractor Performance Evaluations (CPEs) for PE are based on these BPRs. Intermediary budget requests must ensure implementation of all PE program requirements in the Medicare Intermediary Manual, Section 3040 (or appropriate Program Integrity Manual section) and pertinent program memoranda in addition to those requirements specified in this document.

#### Staffing Requirements

Intermediaries must assign staff to the provider enrollment function commensurate with the enrollment workload. Those employee(s) must be considered competent by a reasonable reviewer based upon their experience, education and/or formal training provided to them by the FI and/or HCFA training sessions. The PE staff must ensure that enrollment actions are completed accurately, according to the standards set by HCFA, and within specified time frames. The interaction with the provider community on PE issues is to be handled knowledgeably, professionally, and courteously.

Interaction and coordination among the contractor's fraud unit, medical review unit, provider enrollment unit, and provider relations unit are essential in determining the appropriate actions to be taken to resolve Program Integrity issues. The goal of this coordinated effort is for all parties to work as an informed team to arrive at an agreed upon resolution of outstanding Program Integrity concerns/issues. Additionally, maintain a dialogue and exchange of information with provider enrollment counterparts at the other intermediaries and/or carriers servicing as necessary.

#### Ongoing Provider Enrollment Activities

Intermediaries must complete all PE actions within the specified time frames and in compliance with the operational standards contained in the Intermediary Manual (or appropriate Program Integrity Manual section) and program memoranda relevant to the process for enrolling providers, such as verifying ownership and all other pertinent data.

Report all costs associated with the following mandatory requirements:

- Attending annual PE Conferences at HCFA Central Office by all essential staff, e.g., managers or personnel intimately involved in the PE process;
- Maintaining up-to-date information on State and local licensing and accreditation requirements for each category of provider in your jurisdiction;
- Maintaining up-to-date information on central contact persons and addresses for State agencies in your jurisdiction.
- Establishing/maintaining processes for getting timely license revocation information from State and local jurisdictions;
- Mailings related to PE;
- Handling provider inquiries related to PE in an efficient and timely manner. HCFA is installing a 1-800 line for providers to contact PE staff or dedicated PE customer service staff person to handle questions before the submission of the Form HCFA-855;
- All activities involved in receiving, controlling, reviewing, validating and processing the PE applications and supporting documents, including but not limited to:

- coordinating enrollment of certified providers with State survey and certification agencies and HCFA ROs;
- sharing information with other intermediaries and carriers gained during the enrollment process, which might indicate the possible existence of a program integrity issue affecting another jurisdiction;
- coordinating with other intermediary units regularly, and on an as needed basis, per the AStaffing Requirements section;
- as part of the initial review of an application, to the maximum extent possible, utilize telephone contacts with the applicant to resolve discrepancies and/or request additional information. Such discrepancies include, but are not limited to, submitted Social Security Numbers (SSNs) and Employer Identification Numbers (EINs) emanating from data exchanged between HCFA, the Social Security Administration and the Internal Revenue Service. Written correspondence is expected if telephone contact cannot be accomplished or it is impractical to request the information verbally;
- verifying provider data related to the applicant and associated parties as listed on the Form HCFA-855, including checks for felony convictions with prison time served. This verification should be accomplished through the use of third party resources.
- checking names and other identifying information against the OIG sanction/exclusion list, the GSA debarment list, the Healthcare Integrity and Protection Data Bank (HIP Data Bank) and the Fraud Identification Database (FID) to ensure that billing privileges are not granted or retained by individuals and entities on those lists in accordance with existing program instructions;
- performing (or completing through contracted third party services) onsite visits to individual problematic providers, determined necessary by the intermediary or other individual provider types as required by HCFA;
- coordinating efforts with national CMHC site visit contractors, HCFA ROs, and State agencies to initiate CMHC visits as required by HCFA;
- entering/updating provider data into the Provider Enrollment and Chain Ownership System (PECOS), to include new/revised CROWD data relevant to PE if PECOS is not available (Intermediaries are expected to connect with PECOS in August – October, 2000.);
- entering/updating the provider/supplier data in the UPIN Registry, i.e., Medicare Provider Identification and Eligibility Record (MPIER);
- assisting the ROs in an appeal process following HCFA requirements;

NOTE: The HCFA-855 processing times and percentages will not go into effect until the revised 855 and its instructions, as well as the regulation, are published. January, 2001 is the planned date for final publication.

- processing initial applications from receipt in the mailroom through the final decision 90 percent of the time within 60 days or sooner and 99 percent of the time within 120 days. This excludes the time the RO or State agency spends making CHOW determinations as well as time spent on complex provider based status determinations;
- processing requests for change applications from receipt in the mailroom through the final decision 90 percent of the time within 45 days or sooner and 99 percent of the time within 60 days;

- accomplishing a 20 percent national reduction in application return rates when returned for additional information;
- flagging the applicant's record to allow for updating after the final decision is made on a pending adverse legal action (see FID). Also flag providers who have had or are experiencing bankruptcies;
- ensuring that all applications are promptly logged in and date stamped when they are received by the FI. Tracking of the date of final disposition, i.e. recommendation for approval, denial, or return of an application that was never updated by the provider.
- ensuring through ongoing review of provider enrollment files, or the addition of a system edit, to allow for the timely recommendation to the RO for FI deactivation of provider numbers/billing privileges where the provider fails to meet program instruction requirements, including the deactivation of numbers for providers that have not billed the Medicare program for two consecutive quarters; and,
- generating letters to providers informing them that their billing number was deactivated (i.e., turned off for claims) and that they must attest that their enrollment file is current and correct before they are allowed to submit claims. However, when a Federal agency requests the status of the provider, state that they do indeed have Medicare privileges.
- When necessary, review and investigate billing agency agreements to ensure full compliance with operational guidelines.
- Maintaining PE information on the contractor's company website to include, at a minimum, any additional information not included on the HCFA web site that the provider requires, e.g. State specific provider requirements.
- Surety Bonds or Government securities for Home Health Agencies (HHAs), Comprehensive Outpatient Rehabilitation Facilities, and Rehabilitation Agencies: after HCFA publishes the necessary regulations and program instructions, the audit intermediaries will send notifications to applicable providers regarding the need for a surety bond or Government security; track which entities have submitted bonds or Government securities; follow-up with noncomplying entities (including intermediary actions associated with provider terminations); verify bonds or Government securities that have been received for validity and compliance with regulations; put in place a mechanism to ensure the bond is renewed on or before its expiration date; visit a targeted sample of providers that are not subject to surveys in a given year; coordinate all efforts between HCFA, the RHHIs and the Medicaid State Agencies (MSA) in the implementation and administration of the dual obligee surety bond; and send a copy of the dual obligee surety bond to the respective MSA. However, RHHIs will still perform the claims processing for these provider types.
- In accordance with HCFA instructions under development, distribute blank HCFA-855s to providers as required. FIs will be instructed to distribute completed copies of HCFA-855s to the applicable State agency or RO within ten calendar days of receipt.
- Review any providers claiming to be provider based or adding practice locations to hospitals on the HCFA-855. Follow any HCFA issued instructions on developing information and making recommendations for provider based determinations. Coordinate with applicable carriers when a health care entity transfers from provider based to a free standing group practice or clinic.
- Review all CHOW, merger and consolidation applications. Coordinate the request between the outgoing owners and the new ones. Contact the old owners and/or new owners if they have not made a HCFA-855 submission. Also, check the bill of sale.

## **FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT**

### **Appeals/Reviews (Intermediary)**

The Appeals & Hearings BPRs are instrumental in ensuring that an appellant's due process rights are protected under the Medicare program. These BPRs make sure that the activities of our contractors are focused on meeting their primary functions.

Intermediary appeals activities include the following:

#### **Part A Reconsiderations - Section 1816(f)(2) of the Social Security Act (Activity Code 12001)**

- Receipt and control of requests for reconsideration. For purposes of meeting timely processing requirements, intermediaries must control receipt of reconsideration requests based on the date of receipt in the corporate mailroom.
- Conduct of reconsideration. At least 75 percent of reconsiderations must be completed within 60 days, and at least 90 percent of reconsiderations must be completed within 90 days.
- Effectuation of the determination, as appropriate.

#### **Workload**

Part A Reconsideration workload (Workload 1 in CAFMII) is the cumulative number of claims as reported on the Form HCFA-2591, Line 7, Total Column.

#### **Part A ALJ Hearings -MIM 33785 and 33786 (Activity Code 12002)**

- Receipt of hearing request. Intermediaries must control receipt of ALJ hearing requests based on the date of receipt in the corporate mailroom.
- Case file assembly and forwarding. Intermediaries must forward requests and appropriate files together to SSA=s Office of Hearings and Appeals within 21 calendar days of receipt.
- Review of the ALJ=s decision.
- Effectuation of the ALJ decision.
  - In the case of an ALJ decision favorable to the appellant (from which an appeal is unlikely) and on which HCFA has not referred to the DAB for own motion review (Agency Referral - formerly referred to as Protest), effectuation should be initiated within 30 days of receipt of the ALJ decision and completed within 60 days.
  - In the case of an ALJ decision unfavorable to the appellant (from which an appeal may be likely) and on which HCFA has not referred to the DAB for own motion review (Agency Referral), effectuation should be completed within 30 days after the time limit for the appellant to ask the Departmental Appeals Board (DAB) to assume jurisdiction passes (appellants have 60 days from the date of the ALJ decision to ask the DAB to review).
  - In the case of an ALJ decision either favorable or unfavorable to an appellant and on which HCFA has referred to the DAB for own motion review, the intermediary is not to effectuate until advised by the Regional Office (RO). Once the RO provides instruction to effectuate, the intermediary is to do so within 30 days.

- As necessary, submit recommended Agency Referral and case file(s) to the designated HCFA Regional Office within 30 days of the date of the ALJ's decision, (RO must get agency referral to the DAB by the 40th day).
- Responding to Departmental Appeals Board (DAB) Requests for ALJ Case Files

As of May 1, 2000, Empire Blue Cross will be holding for 120 days all ALJ decisions that are either totally or partially unfavorable to an appellant. When an appellant requests a DAB review, the DAB will request that Empire forward the case as directed. Where appellants do not request DAB review, Empire will forward the case file, after the 120 day period, to the appropriate contractor. With this new system in place, it is expected that DAB requests for case files from contractors will be greatly reduced for actions that take place subsequent to May 1, 2000. There still will be situations, however, where contractors will be required to provide case files to the DAB (e.g., for actions occurring prior to May 1, 2000).

- After the intermediary receives an ALJ decision/dismissal and case file, they must review the ALJ's decision, effectuate (as necessary), and then file the case file (based on applicable records retention requirements).
- The intermediary should maintain the case file in the exact order, manner, etc., as sent by the ALJ, and should not make any marks or write on any documents contained in the case file. The case file is to be filed in a manner that allows the contractor to retrieve it based on any of the following indicators: Docket Number, Beneficiary HIC number, month of ALJ's decision, Provider/Supplier number.
- The intermediary should maintain a log of all requests made by the DAB for case files. The intermediary is to note the date the request was received, the manner in which the request was made (phone, fax, e-mail, etc.), the name of the contact at DAB making the request, the identifying information that the DAB provided in support of their request, and the disposition by the intermediary of the request.
- When the intermediary locates the case file(s) that the DAB has requested, they are to forward the case file to the DAB, at the address provided by the DAB, within 21 calendar days of the request for case file. The case file is to be sent to the DAB in the exact order in which it was returned by the ALJ to HCFA. The original case file (not a copy) with no alterations (deletions, additions or changes) is to be sent. The intermediary must log in the date the case file was forwarded to the DAB.
- If the intermediary is unable to locate a requested case file, they are to notify the DAB immediately, in writing, that either:
  - a. the intermediary is not the owner of that case file; or
  - b. the intermediary was not given sufficient information to allow for identification of the case file.

In either a. or b., the intermediary must notify the DAB in writing within 14 calendar days, and the intermediary must also notify, in writing, their RO appeals contact.

- ALJ Orientation Sessions
  - Orientation sessions for ALJs can be discretionary but if opted for should be approximately 1 ½ days long in order to justify the ALJ's travel expenses.

- Intermediaries should give at least 2 months advance notice of scheduled sessions. ALJs generally schedule their hearings about 2 months in advance, therefore, if not given sufficient lead-time; they may not be available to attend scheduled sessions.
- All orientation sessions must be coordinated through the intermediary's HCFA Regional Offices (RO). Intermediaries should work with their RO very closely when considering hosting an ALJ session. The RO contact will clear the proposed training dates with OHA.
- When possible, intermediaries should work with other contractors in their region to provide consolidated orientation sessions.
- Intermediaries should work with OHA, ALJs, and their RO to develop the agenda for the orientation sessions

### Workload

Part A ALJ Hearings workload (Workload 1 in CAFMII) is the cumulative number of claims as reported on the Form HCFA-2591, Line 57, Total Column.

### **Part B Fair Hearings -- (Processed by Fiscal Intermediaries)- Section 1842(b)(2)(B) of the Social Security Act (Activity Code 12003)**

- Receipt and control of hearing request. For purposes of meeting timely processing requirements, intermediaries must control receipt of hearing requests based on the date of receipt in the corporate mailroom.
- Conduct of hearing. At least 90 percent of Part B hearings must be completed within 120 days.
- Effectuation of the decision, as appropriate.

### Workload

Part B Fair Hearings workload (Workload 1 in CAFMII) is the cumulative number of claims as reported on the Form HCFA-2591, Line 7, Hearings Column.

### **Part B ALJ Hearings -- (Processed by Fiscal Intermediaries) -MIM 33786 (Activity Code 12004)**

- Receipt of hearing request. Intermediaries must control receipt of ALJ hearing requests based on the date of receipt in the corporate mailroom.
- Case file assembly and forwarding. Intermediaries must forward requests and appropriate files together to SSA's Office of Hearings and Appeals within 21 calendar days of receipt.
- Review of the ALJ decision.
- Effectuation of the ALJ decision.
  - In the case of an ALJ decision favorable to the appellant (from which an appeal is unlikely) and on which HCFA has not referred to the DAB for own motion review (Agency Referral - formerly referred to as Protest), effectuation should be initiated within 30 days of receipt of the ALJ decision and completed within 60 days.
  - In the case of an ALJ decision unfavorable to the appellant (from which an appeal may be likely) and on which HCFA has not referred to the DAB for own motion review (Agency

Referral), effectuation should be completed within 30 days after the time limit passes for the appellant to ask the Departmental Appeals Board (DAB) to assume jurisdiction (appellants have 60 days from the date of the ALJ decision to ask the DAB to review).

- In the case of an ALJ decision either favorable or unfavorable to an appellant and on which HCFA has referred to the DAB for own motion review the intermediary is not to effectuate until advised by the Regional Office. Once the RO provides instruction to effectuate, the intermediary is to do so within 30 days.
- As necessary, submit recommended Agency Referral (formerly Protest) and case file(s) to the designated HCFA Regional Office within 30 days of the date of the ALJ's decision, (RO must get agency referral to the DAB by the 40th day).
- Responding to Departmental Appeals Board (DAB) Requests for ALJ Case Files.

As of May 1, 2000, Empire Blue Cross will be holding for 120 days all ALJ decisions that are either totally or partially unfavorable to an appellant. When an appellant requests a DAB review, the DAB will request that Empire forward the case as directed. Where appellants do not request DAB review, Empire will forward the case file, after the 120 day period, to the appropriate contractor. With this new system in place, it is expected that DAB requests for case files from contractors will be greatly reduced for actions that take place subsequent to May 1, 2000. There still will be situations, however, where contractors will be required to provide case files to the DAB (e.g., for actions occurring prior to May 1, 2000).

- After the intermediary receives an ALJ decision/dismissal and case file, they must review the ALJ's decision, effectuate (as necessary), and then file the case file (based on applicable records retention requirements).
- The intermediary should maintain the case file in the exact order, manner, etc., as sent by the ALJ, and should not make any marks or write on any documents contained in the case file. The case file is to be filed in a manner that allows the contractor to retrieve it based on any of the following indicators: Docket Number, Beneficiary HIC number, month of ALJ's decision, Provider/Supplier number.
- The intermediary should maintain a log of all requests made by the DAB for case files. The intermediary is to note the date the request was received, the manner in which the request was made (phone, fax, e-mail, etc.), the name of the contact at DAB making the request, the identifying information that the DAB provided in support of their request, and the disposition by the intermediary of the request.
- When the intermediary locates the case file(s) that the DAB has requested, they are to forward the case file to the DAB, at the address provided by the DAB, within 21 calendar days of the request for case file. The case file is to be sent to the DAB in the exact order in which it was returned by the ALJ to HCFA. The original case file (not a copy) with no alterations (deletions, additions or changes) is to be sent. The intermediary must log in the date the case file was forwarded to the DAB.
- If the intermediary is unable to locate a requested case file, they are to notify the DAB immediately, in writing, that either:
  - a. the intermediary is not the owner of that case file; or,
  - b. the intermediary was not given sufficient information to allow for identification of the case file.

In either a. or b., the intermediary must notify the DAB in writing within 14 calendar days, and the

intermediary must also notify, in writing, their RO appeals contact.

- ALJ Orientation Sessions

- Orientation sessions for ALJs can be discretionary but if opted for should be approximately 1 ½ days long in order to justify the ALJ's travel expenses.
- Intermediaries should give at least 2 months advance notice of scheduled sessions. ALJs generally schedule their hearings about 2 months in advance, therefore, if not given sufficient lead-time; they may not be available to attend scheduled sessions.
- All orientation sessions must be coordinated through the intermediary's HCFA Regional Offices (RO). Intermediaries should work with their RO very closely when considering hosting an ALJ session. The RO contact will clear the proposed training dates with OHA.
- When possible, intermediaries should work with other contractors in their region to provide consolidated orientation sessions.
- Intermediaries should work with OHA, ALJs, and their RO to develop the agenda for the orientation sessions

### Workload

Part B ALJ Hearings workload (Workload 1 in CAFMII) is the cumulative number of claims as reported on the Form HCFA-2591, Line 57, Part B Column.

### **Part B Telephone Reviews -- (Processed by Fiscal Intermediaries) (Activity Code 12005)**

- Receipt and control of review request from date of initial call request.
- These reviews are intended to replace standard reviews where there is the expectation that it can be carried out more expeditiously and/or it provides an easier burden on the appellant. When there would appear to be a need for a significant amount of either routine or complex documentation, or where the appellant would benefit from a more in-depth process, it might be appropriate to carry out the standard review process.
- Effectuation of the determination, as appropriate.

### Workload

Part B Telephone Reviews workload (Workload 1 in CAFMII) is the cumulative number of claims associated with Part B telephone reviews.

### **Part B Reviews (Non-Telephone) (Processed by Fiscal Intermediaries) -Section 1842(b)(2)(B) of the Social Security Act (Activity Code 12006)**

- Receipt and control of review request. For purposes of meeting timely processing requirements, intermediaries must control receipt of review requests based on the date of receipt in the corporate mailroom.
- Conduct of review. At least 95 percent of Part B reviews must be completed within 45 days and must be accurate and clear with appropriate customer-friendly tone and clarity.
- Effectuation of the determination, as appropriate.

### Workload

Part B Reviews (Non-Telephone) workload (Workload 1 in CAFMII) is the cumulative number of claims as reported on the Form HCFA-2591, Line 7, Reviews Column.

### **Continuous Quality Improvement Program**

- Intermediaries must continue to use their appeals analysis program to find and reduce unnecessary appeals and improve upon performance requirements. A program may include actions such as distributing provider and beneficiary surveys, making education contacts, analyzing actual files, making recommendations to ROs about how to clarify remittance messages, and writing newsletter articles. The program must determine the cause of unnecessary appeals and take action to reduce or eliminate them.
- Intermediaries must have the capability to produce analytical instruments (i.e., specific reports) to show trends in the appeals process for providers versus beneficiaries to provide feedback to HCFA on trends observed. For example, intermediaries should identify claims for particular services that routinely result in appeal requests and identify reasons for reversals to determine ways to prevent unnecessary appeals that result in reversals.
- Intermediaries must submit quarterly reports identifying the results and findings of their appeals analysis program to the appropriate Regional Offices within 30 days after the end of the quarter so that Regional Offices can summarize the reports and forward to Central Office within 30 days after receipt of the intermediaries' reports.

## FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT

### Inquiries (Intermediary)

**NOTE: BENEFICIARY AND PROVIDER INQUIRY ACTIVITIES ARE SHOWN SEPARATELY IN THESE BPRS.**

### BENEFICIARY INQUIRIES

In keeping with our FY 2000 Beneficiary efforts, we are maintaining our pursuit of HCFA's strategic plan goal of becoming a customer-centered organization. HCFA is focusing on providing improved service to all customers, including Medicare beneficiaries. The FY 2001 Intermediary Beneficiary and Provider Inquiry BPRs are designed to encompass HCFA's Strategic Plan and facilitate improving customer service. The FY 2001 BPRs continue to reflect the Agency's commitment to the Government Performance and Results Act of 1993, the Chief Financial Officers Act of 1990, and the Government Management Reform Act of 1994. HCFA requests that each Intermediary prioritize its workload in such a manner to ensure high quality service to all beneficiaries. HCFA expects that each Intermediary will continue to prioritize its inquiry workloads in the following sequential manner:

- 1) Telephone Inquiries (including Quality Call Monitoring and Beneficiary Satisfaction Survey activities),
- 2) Walk-in Inquiries,
- 3) Written Inquiries,
- 4) Beneficiary Outreach to improve Medicare customer service.

**BENEFICIARY TELEPHONE INQUIRIES – (Activity Code 13005) - See Attachment 1 as well as the Telephone Customer Service Web Site <https://www.hcfa.gov/medicare/callcenter> for Definitions.** **NOTE: We are adding two new Budget Activity Codes to breakout Beneficiary Quality Call Monitoring and Beneficiary Satisfaction Survey.**

The FY 2001 Budget and Performance Requirements for Telephone Inquiries are intended to further demonstrate HCFA's commitment to customer service by requiring that contractor budgets for telephone inquiries are based on key performance measures. The measures are designed to be representative of the life cycle experience of the caller from *Pre-Contact* or from call inception to *Post-Call* or after call wrap-up. The measures will allow HCFA to ensure that Intermediaries are providing **quality** customer service and that they are doing this **efficiently**.

The measures provide HCFA a complete picture of the operations associated with the contractor's handling of customer inquiries. The measures are balanced across quality, cost, and time in order to ensure that they reflect the agency's priorities, the contractor's operations, and acknowledge available resources. It is anticipated that all of the performance measures shown below can be captured using existing systems and infrastructure.

Standard definitions and detailed calculations for each of these measures have been developed and are provided as Attachment 1. The definitions and calculations are also posted on the Telephone Customer Service web site.

HCFA is currently testing Medicare Beneficiary Interactive Voice Response (IVR) scripts with the intent of implementing them at either selected or all call centers depending on the findings of the test. Each call center will be given ample notice of our intent to implement this script. No cost estimate will be necessary for the initial budget request.

During FY2001, HCFA will be developing standardized training processes and materials for telephone Customer Service Representatives (CSRs).

HCFA will be expanding toll-free service for beneficiaries to all *Part A Intermediaries*. This will be accomplished

through a new government-wide telephone contract negotiated by the General Services Administration. This telephone service is known as Federal Technology Service (FTS) 2001. The costs associated with this toll-free service will be paid centrally by HCFA and should not be considered by contractors in future budget requests. However, Medicare Contractors will still be responsible for all other internal telecommunications costs and devices such as agent consoles, handsets, internal wiring & equipment (ACDs PBX, etc.) and any local or outbound telephone services and line charges.

Any toll-free Medicare Beneficiary customer service number provided and paid for by HCFA must be printed on all beneficiary notices (MSN, EOMB, etc.), immediately upon activation. This toll-free number shall be prominently displayed so the reader will know whom to contact regarding the notice.

Intermediaries will no longer be responsible for publishing their Beneficiary 1-800 inbound telephone numbers in the local telephone books. HCFA will take care of publishing all Beneficiary telephone numbers in the appropriate telephone books.

### **Instructions:**

All tasks related to this activity are mandatory and shall be reported to HCFA's web-based Customer Service Assessment and Management System (CSAMS) as required.

Required beneficiary performance measures are listed below:

#### Pre-Contact Measures

1. Report Total Calls Offered to the Beneficiary call center for the month, defined as the number of calls that reach the call center's telephone system, which can be split up according to trunk lines in instances where a call center is taking calls for Part A, B and other non-HCFA calls.
2. All systems related to inbound beneficiary calls to the center should be programmed to acknowledge each call within 20 seconds (4 rings) before an agent, IVR or Automated Call Distributor (ACD) prompt is reached. This measure will not be required to be reported, but must be substantiated when requested. (This was previously reported as Average Speed of Answer in CSAMS)
3. The monthly All Trunks Busy (ATB) Internal Rate shall not exceed 10%. Any exceptions to this performance level should be annotated in the monthly report. For all toll free lines, the ATB external rate must be reported.
4. For callers choosing to talk with a Customer Service Representative (CSR), 97.5% or more telephone calls shall be answered within 120 seconds; with no less than 85% being answered within the first 60 seconds.
5. If callers encounter a temporary delay before a customer service representative is available, a recorded message will inform them of the delay. The message will also request that the beneficiary have certain information readily available (Medicare card) before speaking with the agent. During peak volume periods, the message shall indicate a preferred time to call.

Note: Call Centers utilizing IVR technology should program the IVR to provide callers with an after-hours message indicating normal business hours (It is not necessary to duplicate this message if the caller is informed of the normal business hours via the telephone system prior to being delivered to the IVR). If call centers have IVRs that allow the recording of messages after hours, this service should be eliminated no later than September 30, 2000. The contractor should inform the Regional Office and the Director of Call Center Operations, CBS of the proposed date of this action.

#### Call Handling Measures

6. Report Call Abandonment Rate, which is the percentage of beneficiary calls that abandon their call from the ACD queue. This should be reported as three separate measures:
  - 1) Calls abandoned up to and including 60 seconds,
  - 2) Calls abandoned up to and including 120 seconds, and
  - 3) Calls abandoned after 120 seconds.
7. Report the monthly Average Speed of Answer. This is the amount of time that all calls waited before being connected to a CSR. It includes ringing, delay recorder(s) and music.
8. CSRs must identify themselves when answering a call, however, the use of *both* first and last names in the greeting will be optional. In order to provide a unique identity for each CSR for accountability purposes, where a number of CSRs have the same first name, it is suggested that the CSRs also use the initial of their surname. If the caller specifically requests that a CSR identify himself/herself, the CSR should provide both first and last name. Where the personal safety of the CSR is an issue, call center management should permit the CSR to use an alias. This alias must be known for remote monitoring purposes. CSRs should also follow local procedures for escalating calls to supervisors or managers in situations where warranted.
9. Report monthly Average Talk Time (which includes any time the caller is placed on hold by the CSR), targeting call duration between 3 and 7 minutes (180-420 seconds).
10. Handle no less than 80% of calls to completion during the initial call - minimizing transfers, referrals and callbacks.
11. Track Call Center call handling productivity, calculated by the total calls handled divided by the total CSR FTEs in the center, setting a minimum performance objective of 1100 calls per FTE per month for Non-Medicare Customer Service Center (MCSC) call centers and 1000 calls per month for MCSC call centers. This should be accomplished by all call centers without sacrificing the quality of calls and with minimal referrals. MCSC call centers should take advantage of handling multiple issued calls (Part A, Part B, DME, etc.) without referral to ensure maximum utilization the MCSC desktop.
12. Report Occupancy Rate, the percent of time that CSRs spend in active call handling (i.e., on incoming calls, after call work or outbound calls).

#### Post-Call Measures

13. Report monthly Average After Call Work Time (wrap-time), which includes all the time that the CSR needs to complete all administrative work associated with call activity after the customer disconnects.
14. Report the status of those calls not resolved at first contact. Those calls should be reported as follows:
  - a) Callbacks required (This number is based on calls received for the calendar month and represents the number requiring a callback as of the last workday of the month)
  - b) Callbacks closed within 2 workdays (This number is based on calls received for the calendar month and represents the number closed as of the last workday of the month)
  - c) Callbacks closed within 5 workdays (This number is based on calls received for the calendar month and represents the number closed as of the last workday of the month)
  - d) Callbacks pending over 20 workdays (The number represents all callbacks currently pending on the last workday of month)

#### Staffing

15. As needed, develop a corrective action plan to resolve deficient performance in the call center, and maintain results on file for regional office (RO) review.

16. Develop a proficiency test to be used for new CSRs and as needed for existing personnel. Target no less than an 80% first time pass rate for the proficiency test.

#### Diverse Populations

17. Maintain and operate a telephone device for the deaf such as TDD/TTY.
18. Maintain the ability to respond directly to telephone inquiries in both English and Spanish.

#### Workload

Beneficiary Telephone Inquiries workload (Workload 1 in CAFMII) is the cumulative inquiries as reported on the HCFA-1566, Line 35, Beneficiary Column.

#### **BENEFICIARY QUALITY CALL MONITORING - (Activity Code 13014; Previously reported in Activity Code 13005.)**

1. Measure and report the quality of service continuously by employing the Quality Call Monitoring (QCM) Process developed for FY 2000.
  - Monitor *no more than* 10 calls per CSR per quarter for quality. Individual CSR data shall be analyzed regularly, areas needing improvement identified, and corrective action plans should be implemented and documented.
  - The sampling routine must ensure that CSRs are monitored at the beginning, middle and end of the month (ensuring that assessments are distributed throughout the week) and during morning and afternoon hours.
  - Participate in national and regional calibration sessions organized by HCFA.
  - Contractor call centers should conduct regular monthly calibration sessions.
  - The QCM reporting tools and format, as posted on the Web Site, must be used to collect monitoring results which will be reported monthly on CSAMS.

**BENEFICIARY SATISFACTION SURVEY - (Activity Code 13015; Previously reported in Activity Code 13005.)**

1. Survey a random sample of customers using the HCFA-approved, national Beneficiary Satisfaction Survey that was developed for FY 2000.
  - This instrument measures the level of beneficiary satisfaction with the telephone customer service received.
  - Sampling methodology should reflect sound survey practice, such as ongoing sampling throughout the quarter.
  - HCFA expects the survey will be conducted by telephone.

The required number of completed surveys is 400 or 7% of incoming beneficiary calls (whichever is smaller) per contract per quarter. If a contract covers multiple call centers, the sampling interval should reflect the combined call volume and each center should report their portion monthly via CSAMS.

HCFA requires that the response rate be reported in CSAMS monthly. Response Rate is equal to the number of completed surveys divided by the number of eligible calls sampled.

Contractors should target an approval rating of at least 95%. Approval corresponds to responses indicating that CSR's courtesy/politeness is rated "4" to "5" (where "5" is excellent).

**WRITTEN INQUIRIES (Activity Code 13002)**

- All written inquiries are to be processed in accordance with the guidelines provided in the Medicare Intermediary Manual, Sections 2958 and 2959.
- All written inquiries are to be processed using a font size of 12 and a font style of Universal or Times New Roman or another similar style for ease of reading by the beneficiary.
- In FY 2001, every contractor will have the flexibility to respond to beneficiary written inquiries by phone within 45 business days. A report of contact should be developed for tracking purposes. The report of contact should include the following information: Beneficiaries name and address, telephone number, beneficiaries HICN, date of contact, internal inquiry control number, subject, summary of discussion, status, action required (if any) and the name of the customer service representative who handled the inquiry. Upon request, send the beneficiary a copy of the report of contact that results from the telephone response. The report of contact should be retained in the same manner and time frame as the current process for written responses. Use your discretion when identifying which written inquiries (i.e., beneficiary correspondence that represent simple questions) can be responded to by phone. Use the correspondence which includes the requestor's telephone number or use a requestor's telephone number from internal records if more appropriate for telephone responses. If you cannot reach the requestor by phone, do not leave a message for the beneficiary to return the call. A written response should be developed within 45 calendar days from the incoming inquiry.

Any E-mail inquiry received can be responded to by E-mail. Since E-mail represents official correspondence with the public, it is paramount that intermediaries use sound E-mail practices and proper etiquette when communicating electronically. Responses that are personal in nature (contain financial information, HIC#, etc.) cannot be answered by e-mail. Should any e-mail practices or etiquette problems be identified, they should be considered "potential problems" and be forwarded to Central Office, Customer and Teleservice Operations Group for further guidance. However, ensure that e-mail responses utilize the same guidelines that pertain to written inquiries (i.e., timeliness, accuracy, clarity, tone, comprehension, etc.).

Medicare Intermediary Instructions will be updated to reflect new changes.

### Workload

Written Inquiries workload (Workload 1 in CAFMII) is the cumulative inquiries as reported on the HCFA-1566, Line 37, Total Column.

### **WALK-IN INQUIRIES (Activity Code 13003)**

1. General - Give individuals making personal visits to you the same high level of service you would give through phone contact. The interviewer must have the same records available as a telephone service representative to answer any questions regarding general program policy or specific claims related issues.

If a beneficiary inquires about a denied or reduced claim, give him/her the same careful attention given during a hearing, i.e., the opportunity to understand the decision made and an explanation of any additional information which may be submitted when a review is sought. Make the same careful recording of the facts as for a telephone response, if it appears further contact or a review will be required.

2. Guidelines for High Quality Walk-In Service -

- o After contact with a receptionist, the inquirer must not wait longer than 10 minutes to meet with a service representative.
- o Waiting room accommodations must provide seating.
- o A comprehensive selection of Medicare publications should be available for the beneficiary's use.
- o Inquiries must be completed during the initial interview to the extent possible.

### Workload

Walk-In Inquiries workload (Workload 1 in CAFMII) is the cumulative inquiries as reported on the HCFA-1566, Line 36, Total Column.

### **CUSTOMER SERVICE PLAN (Activity Code 13004)**

All Intermediaries and Regional Home Health Intermediaries are instructed to develop a Customer Service Plan (CSP) to support the requirements outlined below and to submit the plan with their Budget Request. Provide to your Regional Office (RO) the name and the phone number of your CSP Coordinator along with a back-up analyst who will be responsible for the ongoing management of the plan activities. Reports detailing CSP activity must be sent to your RO and CO twice a year. Specific dates and content requirements are described in the attached CSP Reporting Requirements FY 2001. Plans sent to Central Office should be addressed to the *Center for Beneficiary Services - Division of Contractor Customer Service Operations* within 30 days after the close of the semester.

Include in your reports a method to quantitatively analyze and demonstrate the effectiveness of the individual initiatives.

Further guidelines detailing the reporting procedures can be found in Attachment 2 (CSP Reporting Requirements FY 2001).

### **Required CSP Activities (Beneficiary)**

- I – 1: Intermediaries will be expected to participate in the National Education Medicare Program (NMEP) as a part of their ongoing outreach efforts to the beneficiaries. The role will be limited to sending out HCFA-prepared or approved information in the form of brochures, pamphlets, presentations, etc. The

intermediaries will not be expected to develop materials independently, since we want to be consistent in our national presentation. Additionally, Intermediaries may receive general inquiries related to Medicare+Choices plans and the availability of plan options. You will be expected to respond to these inquiries, as appropriate, with HCFA approved Medicare+Choice information. HCFA will provide you through the REACH campaign with information in the form of training materials, general information, lists of frequently asked questions, and plan specific comparative information. Intermediaries should regularly communicate with the Regional Offices to ensure consistency with the REACH 12 month calendar.

- I – 2: Support ongoing Medicare Preventive initiatives such as: flu (pneumococcal vaccines), informational pamphlets detailing coverage of mammography (breast cancer), cervical cancer (pap smear), bone mass measurement, colo-rectal cancer screenings, prostate cancer screening, and diabetes self-management.
- I – 3: Intermediaries should establish partnerships and meet with local and national coalitions, and beneficiary counseling and assistance groups on an ongoing basis. Topics of discussion should include current Medicare program information, methods to better educate Medicare beneficiaries on current policies, coverage issues and other items as identified by your inquiries analysis program. These meetings should be used as an opportunity to share significant lessons learned and best practices.
- I – 4: Incorporate initiatives designed to increase customer service levels for special populations such as: blind, deaf, disabled and any other vulnerable population of Medicare beneficiaries. Conducting ongoing meetings with advocacy organizations is strongly recommended.
- I – 5: Intermediaries serving areas with high concentrations of non-English speaking beneficiaries must incorporate initiatives designed to increase customer service levels to those populations. Activities that are to be considered include distributing Medicare information in native languages, based on the needs of local communities, and utilizing bilingual staff to conduct educational and informative seminars on Medicare topics. Intermediaries should increase their efforts to partner with local groups and organizations, representing Medicare's diverse population, to increase the level of customer service to the non-English speaking beneficiaries.
- I – 6: Regional Home Health Intermediaries (RHHIs) must conduct outreach efforts designed to educate beneficiaries on efficient use of the home health benefit, general home health information/services, coverage issues, fraud and abuse prevention and detection. RHHIs should partner with local intermediaries and carriers for outreach efforts in home health. Educational materials should be developed and distributed to beneficiaries via outreach meetings and public seminars, congressional offices, councils on aging, public libraries, and health care provider offices. Public Service Announcements (PSAs) should be distributed to local media (radio, cable networks, television stations and newspapers).

This list of activities is designed to improve service to our primary customer, the beneficiary. Open lines of communication between you, Central Office, and your Regional Office, as well as with beneficiaries and beneficiary organizations, will be necessary to ensure that operating priorities are properly set, and plan objectives are accomplished in a creative and cost-effective manner.

#### **BENEFICIARY WEB SITES (Activity Code 13009)**

The Budget and Performance Requirements (BPRs) for beneficiary web sites for FY 2001 are based on HCFA's goal of providing world class customer service and useful information to beneficiaries. Information geared towards beneficiaries and their caregivers on contractor web sites may be seen as enhancements to the existing customer service outlets of toll free telephone service (including both contractor call centers and 1-800-MEDICARE), beneficiary outreach events, Medicare publications produced by HCFA and *medicare.gov*.

Most contractors already have in place web sites, but the quality of these sites varies greatly. Some sites contain beneficiary information, while others do not. The requirements described in this section should be followed for

developing a new site or modifying an existing site. This is the first year that BPRs have been developed to assist contractors in implementing beneficiary web sites. The requirements and tasks for setting up beneficiary web sites are mandatory.

#### Requirements for Beneficiary Web Sites (Mandatory)

By the end of the first quarter of FY 2001 (December 31, 2000), you must develop and implement a beneficiary web site with information geared towards beneficiaries and their caregivers. The development of web sites must follow HCFA Standards and Guidelines. Your web site must comply with HCFA's A Contractor Web Site Standards and Guidelines posted at <http://www.hcfa.gov/about/web/contrsng.asp>. In addition, the features and contents of these web sites must be in accordance with the following requirements:

- your web site should be a separate, unique Medicare web site, not a subdomain of your corporate domain, although it may coexist with the Medicare provider education and training site required by the BPRs;
- if your beneficiary web site coexists with the provider web site, the common home page should be simple with a **provider** button and a **beneficiary** button;
- your web site must link to *medicare.gov*, and include the HCFA alpha representation as part of its graphics; it should also link to *cms.hhs.gov* if it coexists with the provider web site;
- your web site must not duplicate any material on *medicare.gov* (you will be responsible for reviewing what is on *medicare.gov*, so that no duplication occurs);
- your web site must contain material unique to your local service area that would be of interest to beneficiaries and their caregivers;
- your web site should offer walk-in, written, and telephone contact information, including driving instructions to walk-in locations;
- your web site should contain minutes of Beneficiary Advisory Committee meetings and meeting schedules;
- your web site should include beneficiary newsletters, if you produce one;
- your web site should contain information on how to use your beneficiary automated response unit, if you have one;
- your web site should provide a list of local contacts useful to senior citizens and their caregivers—e.g., local and state governmental agencies, local Social Security offices, local senior centers, etc.;
- your web site should link to other web sites of interest to senior citizens and their caregivers (examples include Social Security Administration, local aging agencies, etc.); your web site should link to the Outreach Calendar on *medicare.gov*;
- your web site should include an online feedback form for comments about your web site and for general inquiries (you must include privacy language discouraging inquiries about specific claims or questions that would necessitate sending personal, uniquely identifiable information);
- your web site content should be updated regularly; there should be in place a process for regular updating; you should submit the details of your updating process and your web site address, along with a certification statement that your web site was up and running by the due date of December 31, 2000, to: HCFA, CBS, CTOG, DCCSO, C2-26-20, 7500 Security Boulevard, Baltimore, Maryland 21244-1850, ATTN: Lynne Lockard; you may also email this information to: [llockard@cms.hhs.gov](mailto:llockard@cms.hhs.gov); this information should be submitted by March 31, 2001;
- your web site should link to *medicare.gov* for Medicare publications; you may provide a link to your own publications if you produce and print your own publications;
- your web site should only include Frequently Asked Questions (FAQs) that are locally oriented; there should be no duplication of FAQs on *medicare.gov* (you may, however, provide a link to FAQs on *medicare.gov*);
- your web site should include a "Help" section;
- your web site should have a search capability;
- your web site content should be written and formatted in a beneficiary friendly tone (no more than an eighth grade reading level); and
- test your web site with a variety of browsers.

**NOTE:** If you already have a beneficiary web site, you must revise the content and format to meet these mandatory

requirements.

### Suggestions for Information to Include in Your Beneficiary Web Site

The following are guidelines you may wish to consider when developing your beneficiary web site content:

- your web site may include banner ads for the Medicare Compare and Nursing Home Compare databases found on *medicare.gov*; refer to *nmep.org* for directions on downloading and posting these ads to your web site;
- your web site may contain an online MEDPAR search capability; (please note that HCFA is beginning the process to develop a National MEDPAR search capability for *medicare.gov* for sometime in the future);
- if your Medicare contracts cover multiple service areas/multiple claims types, you may wish to consider providing information by service area/state/claims types; and
- your web site may contain any other information you believe relevant to beneficiaries and their caregivers in your service area(s).

### Suggestions for Web Site Design to Enhance Use by Senior Citizens

Below are suggestions for designing and formatting your web site to enhance use by beneficiaries and their caregivers:

- for ease of navigation, place navigation bars on every page so users can easily find their way around your web site, use large buttons and simple, uncluttered graphic links;
- use a font size between 12 and 14 points with headings in a larger font and avoid stylized or fancy fonts (no italics);
- do not make anything on your web site too hard to understand and use;
- try to avoid using PDF files unless you have an alternate text format of the file; these files cannot be read by the visually impaired and users have to download the PDF reader which is an extra step for them to go through;
- use colors with maximum contrast; however, avoid patterned backgrounds, glaring colors (e.g., florescent), and red/green or blue/yellow combinations;
- keep graphics minimal for users with slow modems and less bandwidth—the longer the page takes to download, the more tempted users will be to leave the site;
- do not use moving objects—the elderly have decreased ability to ignore stimuli such as this;
- do not use buzzwords or jargon;
- keep pages short and with no more than 2 or 3 screens; long documents should be broken into sections;
- do not limit window size and code screens to adjust rather than be fixed; include instructions on how to adjust browser so information is best displayed;
- make sure documents are printable; offer advice or suggestions how to correct errors when they are made and include refinement tips for search engines that return too few/too many; and
- if possible, test the web site with a variety of users.

If you have questions about the requirements for beneficiary web sites, contact Lynne Lockard at 410-786-2174 or [llockard@cms.hhs.gov](mailto:llockard@cms.hhs.gov).

### **PROVIDER INQUIRIES**

In FY 2000, HCFA installed FTS2001 toll free lines to handle provider telephone inquiries. The new toll free lines and numbers delivered calls to the existing Intermediary phone systems. **(Note: These are Medicare provider inquiry lines, not data lines for EDI connectivity.)** This transition reflects an increased focus on customer service providers. To the extent feasible, provider inquiry standards will be compatible with beneficiary standards. Contractors shall meet the FY 2001 provider inquiry BPR standards no later than July 1, 2001.

In keeping with our FY 2000 Beneficiary efforts, we are maintaining our pursuit of HCFA's strategic plan goal of becoming a customer-centered organization. HCFA is focusing on providing improved service to all customers, including Medicare providers. The FY 2001 Intermediary provider Inquiry BPRs are designed to encompass HCFA's Strategic Plan and facilitate improving customer service. The FY 2001 BPRs continue to reflect the Agency's commitment to the Government Performance and Results Act of 1993, the Chief Financial Officers Act of 1990, and the Government Management Reform Act of 1994. HCFA requests that each Intermediary prioritize its workload in such a manner to ensure high quality service to all providers. HCFA expects that each Intermediary will continue to prioritize its provider inquiry workloads in the following sequential manner:

- 1) Telephone Inquiries,
- 2) Written Inquiries,
- 3) Provider Outreach to improve Medicare customer service.

**PROVIDER TELEPHONE INQUIRIES – (Activity Code 13006) - See Attachment 1 as well as the Telephone Customer Service Web Site <https://www.hcfa.gov/medicare/callcenter> for Definitions (Unless otherwise specified, Beneficiary and Provider Definitions will be the same.)**

The FY 2001 Budget and Performance Requirements for Telephone Inquiries are intended to further demonstrate HCFA's commitment to customer service by requiring that contractor budgets for telephone inquiries are based on key performance measures. The measures are designed to be representative of the life cycle experience of the caller from *Pre-Contact* or from call inception to *Post-Call* or after call wrap-up. The measures will allow HCFA to ensure that Intermediaries are providing **quality** customer service and that they are doing this **efficiently**.

The measures provide HCFA a complete picture of the operations associated with the contractor's handling of customer inquiries. The measures are balanced across quality, cost, and time in order to ensure that they reflect the agency's priorities, the contractor's operations, and acknowledge available resources. To the extent possible, all of the performance measures shown below should be captured using existing systems and infrastructure already established for beneficiary inquiries. Contractors may also implement manual systems to capture and report required data to HCFA, if that is more cost efficient. Contractors shall report any limitations to their ability to capture and report provider telephone inquiry data to their regional office and to the Deputy Director of PBEG (CHPP) no later than January 1, 2001. Instructions will be included in the April release that will ensure full compliance no later than July 1, 2001.

Standard definitions and detailed calculations for each of these measures have been developed and are provided as Attachment 1. The definitions and calculations are also posted on the Telephone Customer Service web site and unless otherwise specified, Provider telephone inquiries definitions and calculations will be the same as Beneficiary inquiries definitions and calculations.

During FY 2001, HCFA will be developing, testing and issuing standardized training processes and materials for provider telephone Customer Service Representatives (CSRs) to supplement the processes and materials currently being maintained.

#### **Instructions:**

All provider telephone inquiries are to be processed in accordance with the guidelines shown below and will be reported using Activity Code 13006.

Required provider performance measures are listed below:

Pre-Contact Measures (Note: All specified information must be captured and reported to HCFA on a monthly basis. This information may be captured manually, if necessary)

1. Report Total Calls Offered to the provider call center for the month, defined as the number of calls that reach the call center's telephone system, which can be split up according to trunk lines in instances where a call center is taking calls for Part A, B and other non-HCFA calls.
2. All existing systems related to inbound provider calls to the center should be programmed to acknowledge each call within 20 seconds (4 rings) before an agent, IVR or Automated Call Distributor (ACD) prompt is reached. This measure will not be required to be reported, but must be substantiated when requested.
3. The monthly All Trunks Busy (ATB) Internal Rate shall not exceed 10%. Any exceptions to this performance level should be reported to HCFA.
4. For callers choosing to talk with a Customer Service Representative (CSR), 97.5% or more telephone calls shall be answered within 120 seconds; with no less than 85% being answered within the first 60 seconds.
5. If callers encounter a temporary delay before a customer service representative is available, a recorded message will inform them of the delay. The message will also request that the provider have certain information readily available before speaking with the agent. During peak volume periods, the message shall indicate a preferred time to call.

Note: IVRs should be programmed to provide callers with an after-hours message indicating normal business hours (It is not necessary to duplicate this message if the caller is informed of the normal business hours via the telephone system prior to being delivered to the IVR).

Call Handling Measures (Note: All specified information must be captured and submitted to HCFA on a monthly basis. This information may be captured manually, if necessary.)

6. Capture Call Abandonment Rate, which is the percentage of provider calls that abandon their call from the ACD queue. This should be reported as three separate measures:
  - 1) Calls abandoned up to and including 60 seconds,
  - 2) Calls abandoned up to and including 120 seconds, and
  - 3) Calls abandoned after 120 seconds.
7. Capture the monthly Average Speed of Answer. This is the amount of time that all calls waited before being connected to a CSR. It includes ringing, delay recorder(s) and music.
8. CSRs must identify themselves when answering a call, however the use of both first and last names in the greeting will be optional. In order to provide a unique identity for each CSR for accountability purposes, where a number of CSRs have the same first name, it is suggested that the CSRs also use the initial of their surname. If the caller specifically requests that a CSR identify himself/herself, the CSR should provide both first and last name. Where the personal safety of the CSR is an issue, call center management should permit the CSR to use an alias. This alias must be known for remote monitoring purposes. CSRs should also follow local procedures for escalating calls to supervisors or managers in situations where warranted.
9. Capture monthly Average Talk Time (which includes any time the caller is placed on hold by the CSR).
10. Handle no less than 80% of calls to completion during the initial call - minimizing transfers, referrals and callbacks.
11. Track Call Center call handling productivity, calculated by the total calls handled divided by the total CSR FTEs in the center.

12. Capture Occupancy Rate, the percent of time that CSRs spend in active call handling (i.e., on incoming calls, after call work or outbound calls).

Post-Call Measures (Note: All specified information must be captured and reported to HCFA on a monthly basis. This information may be captured manually, if necessary.)

13. Capture monthly Average After Call Work Time (wrap-time), which includes all the time that the CSR needs to complete all administrative work associated with call activity after the customer disconnects.
14. Make substantive callbacks within 2 working days in 100% of the instances when calls are not completed at first contact- ensuring that providers obtain closure on open issues or questions no less than 80% of the time. (This does not include calls that are referred.)

#### Staffing

15. As needed, develop a corrective action plan to resolve deficient performance in the call center, and maintain results on file for regional office (RO) review.
16. Develop a proficiency test to be used for new CSRs and as needed for existing personnel. Target no less than an 80% first time pass rate for the proficiency test.

#### Workload

Provider Telephone Inquires workload (Workload 1 in CAFMII) is the cumulative inquiries as reported on the HCFA-1566, Line 35, Provider Column.

### **PROVIDER QUALITY CALL MONITORING**

1. Measure and report the quality of service continuously by employing the Quality Call Monitoring (QCM) Process developed for beneficiaries in FY 2000.
  - Monitor no more than 10 calls per CSR per quarter for quality. Individual CSR data shall be analyzed regularly, areas needing improvement identified, and corrective action plans should be implemented and documented.
  - The sampling routine must ensure that CSRs are monitored at the beginning, middle and end of the month (ensuring that assessments are distributed throughout the week) and during morning and afternoon hours.
  - Participate in national and regional calibration sessions organized by HCFA.
  - Contractor call centers should conduct regular monthly calibration sessions.

## **FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT**

### **Provider Education and Training (Intermediary)**

The Provider Education and Training (PET) Budget Performance Requirements (BPRs) initiatives for FY 2001 are based on HCFA's goal of providing world class service to its customers and to promote the short and long term fiscal integrity of the Medicare Program. The FY 2001 PET activities are to be allocated between the Program Management (PM) and the Medicare Integrity Program (MIP) budgets. All education and training activities must be conducted free of charge.

PM-PET uses mass media, such as print and Internet, face to face instruction and dialog in classroom and other settings to meet the needs of Medicare providers for timely, accurate and understandable Medicare information. The methods used for instructional design, promotion and dissemination (and the share of resources committed to specific activities) should depend on the scope of the problems and need for education. This may involve policy as well as billing and system issues and are often determined based upon the frequency of inquiries and claim submission errors. PM-PET activities are, for the most part, not targeted to individual providers. PM-PET is designed to be more general in nature and must focus upon training and consulting for both new and current Medicare providers. The scope of PM-PET is to identify and address issues that are of concern to providers. The costs associated with the education and training of these groups of providers and organizations should be budgeted and charged to Activity Code 14001.

This list of activities is designed to improve service to Medicare beneficiaries and providers. Prudent management of your plans will be necessary to achieve our goals. Open lines of communication between you and your RO, as well as with beneficiaries, providers/suppliers and their organizations will be necessary to ensure that operating priorities are properly set and plan objectives are accomplished in a creative and cost effective manner.

### **SUPPORTING DOCUMENTATION FOR FISCAL YEAR 2001 BPR REQUEST**

- If increased funding is requested for PM-PET in FY 2001, please provide additional justifications for any increases. At a minimum, this should include information pertaining to increases in number of providers serviced, expansion of geographical territory, staff turnover, etc. Please provide details, by required item, concerning any additional monetary increases.
- These BPRs identify the work to be performed in FY 2001. The education and training may be performed using various media, however we have separated them into required or discretionary activities. Identify each item for which funding has not been requested. If you have requested funds for each item, so indicate.
- Explain how you plan to allocate costs between PM-PET and MIP-PET. Please keep in mind that any general seminars, conventions, or conferences which address fraud and abuse as well as other Medicare issues, the proportional share of the cost of a function to be allocated to PM-PET is equal to the percentage of time related to addressing other Medicare issues times the cost of the function. For example, the proportional share of the cost of a seminar to be allocated to PM-PET is equal to the percentage of the seminar related to addressing issues other than fraud and abuse multiplied by the cost of the seminar (e.g. if it costs \$4,000 to arrange and conduct a seminar, containing 75 percent program and billing information and 25 percent fraud and abuse information, then the PM cost would be \$4,000 multiplied by .75 or \$3,000 and the remaining \$1,000 would be charged to MIP-PET).

### **ELEMENTS OF PROVIDER/SUPPLIER SERVICE PLAN**

All Intermediaries are instructed to develop a Provider/Supplier Service Plan (PSP) to support the requirements outlined below and submit it with your Budget Request. Your costs for developing the Provider/Supplier Service Plan should not exceed 15 percent of your total budget allocation. The PSP should detail, in chronological order, how each of the required PET activities will be conducted. (Please note the related requirements for

provider/supplier services plan, as well as Activity 13006 Provider Telephone Inquiries.) With your PSP, provide to both Central Office (CO) and your Regional Office (RO), the name and phone number of your PSP coordinator. Plans sent to Central Office should be addressed to the Center for Health Plans and Providers, Division of Provider Education and Training, Mailstop C4-10-07, 7500 Security Boulevard, Baltimore, Maryland 21244.

### **Required PET Activities**

#### **I. Inquiry and Data Analysis**

- A. Implementation and ongoing operation of a provider inquiries analysis program. Maintain and update, on a monthly basis, a list of most frequently asked questions and areas of concern/confusion for providers. Problem areas as determined by claim submission errors must also be tallied and analyzed monthly. Outreach and educational efforts should be developed to address the needs of providers as those needs are made known by these initiatives. Educate providers on program/billing issues evident through this data analysis. (Please note the related requirements for inquiry reduction or prevention activities, as well as Activity 13006 Provider Telephone Inquiries.)
- B. Develop and operate programs to recruit and retain participating physicians and suppliers. Activities should address the needs of physicians and suppliers as indicated by your tracking initiatives, as well as coverage issues, reimbursement, medical necessity policies and billing requirements.

#### **II. Advisory Groups**

- A. Establish a PET advisory group consisting of representatives from State medical societies, provider organizations, billing staffs and others. This body must be involved up front in the selection of topics, types and/or locations for educational forums. After coordinating with the carrier advisory committee (CAC), schedule regular briefings, at least quarterly, to determine which educational forums address the needs identified by your tracking initiatives, as well as specific informational requests as they are received.
- B. Actively participates in those educational forums and professional gatherings that resulted from the discussions with, or recommendations of, the PET advisory group.

#### **III. Bulletins**

- A. Issue regular bulletins/newsletters, at least quarterly, which contain program and billing information. Unless specifically requested by the provider, eliminate regular bulletins sent to providers with no billing activity in the previous twelve months. Send one bulletin addressed to the billing manager. If your prior practice and current operating budget permits it, contractors may send additional bulletins to individual providers/suppliers. All newly created bulletins must be posted on the contractor's website where duplicate copies may be obtained by provider/suppliers. In addition, if providers are interested in obtaining duplicate copies on a regular basis, contractors are permitted to bill providers for a yearly subscription of additional copies. All bulletins/newsletters must have either a header or footer that includes the following bolded language "THIS BULLETIN SHOULD BE SHARED WITH ALL HEALTH CARE PRACTITIONERS AND MANAGERIAL MEMBERS OF THE PROVIDER/SUPPLIER STAFF. BULLETINS ISSUED AFTER OCTOBER 1, 1999 ARE AVAILABLE AT NO-COST FROM OUR WEBSITE AT (INSERT CONTRACTOR WEBSITE ADDRESS)"
- B. Issue the regularly scheduled bulletins/newsletters approximately 45 to 60 days in advance of standard systems releases. Provide print/distribution dates to your RO and CO contact in your PSP. Include deadline dates for the submission of articles in the event RO/Central Office staff wishes to incorporate specific

information or articles.

#### IV. Seminars/Workshops/Teleconferences

- A. Hold seminars or conventions or workshops or down-link/viewing sites for Medicare Learning Network broadcasts and videos (and other face-to-face meetings) to educate providers regarding Medicare program and billing issues. Whenever feasible, you should coordinate these activities with other Medicare contractors in your service area (this may include PROs, other intermediaries or carriers, SHIP programs and ESRD Networks). Whenever feasible, you should coordinate your activities with HCFA partners in your service area, such as State Survey and Certification Agencies, State Medicaid and CHIP programs, Area Health Education Centers, Geriatric Education Centers and State and local Health Departments. Contractors are no longer permitted to charge providers to recoup the costs associated with this type of activity.
- B. Hold teleconferences to address and resolve inquiries from providers, as a method to maximize the number of providers reached.

#### V. New Technologies/Electronic Media

- A. Implement new technologies (e.g., Internet websites) and other electronic means of educating and training providers. The development of websites, Internet applications, etc. should follow HCFA Standards and Guidelines. Your website must comply with HCFA's A Contractor Website Standards and Guidelines posted at <http://www.hcfa.gov/about/web/contrsng.htm>. In addition, the features and contents of these websites must be tested for compatibility with multiple browsers and comply with the following requirements:

##### *Content*

In FY 2001, your website must contain the following:

- All newly created provider bulletins/newsletters; A schedule of upcoming events (seminars/workshops, fairs, etc);
- An ability to register for seminars and other events via the website; and
- Features which permit providers to order and receive copies of bulletins.
- An area designated as the Medicare Learning Network. This area will contain the graphical representation for the Network and program and promotional material supplied by HCFA. This material will be made available to you periodically at <http://www.hcfa.gov/other/bestpractices/default.htm> (the Best Practices site for carrier and intermediary PM-PET staff). This area should also include links to <http://www.hcfa.gov/medlearn/>, <http://www.hcfa.gov/pubforms/pubpti.htm> (the site for downloading HCFA manuals and transmittals, as well as links (that you will need to identify and create) to HCFA contractors and partners;
- A **quarterly** listing of frequently asked questions (FAQs/areas of concern as shown through inquiry and data analysis.

Your website should fit into your existing infrastructure. Existing resources and technologies should be utilized wherever possible to reduce costs.

If possible, your provider outreach website should be established as a SUBDOMAIN of your current commercial website. A subdomain is defined as a unique, separate segment of your current website devoted specifically to one topic (in this case, Medicare provider outreach). The website should neither be on its own separate web server/URL, nor should it be completely integrated with your commercial content. An example of a HCFA-implemented subdomain is <http://www.hcfa.gov/hiv/>. While these websites are located on the cms.hhs.gov servers and maintained by the same staff, they have a different look and feel and unique

content. Great economies of scale are achieved by sharing resources such as bandwidth, functionality (e.g., search engines), and staff.

Your website must implement the following technologies to support use of the site:

- Search engine functionality;
- E-mail based support / help / customer service; and
- An ability to link to other sites such as [www.hcfa.gov](http://www.hcfa.gov) and [www.medicare.gov](http://www.medicare.gov).

In addition, you may want to offer e-mail based mailing lists (listservs) that users can subscribe to for promotion of new content, initiatives, etc.

If you have questions relating to content and funding issues, please contact Jackie Proctor at (410) 786-9019 / [jproctor2@cms.hhs.gov](mailto:jproctor2@cms.hhs.gov). Direct questions regarding technical requirements to Jon Booth at (410) 786-6577 / [jbooth2@cms.hhs.gov](mailto:jbooth2@cms.hhs.gov) or Tim Walsh at (410) 786-7425 / [Twalsh3@cms.hhs.gov](mailto:Twalsh3@cms.hhs.gov).

- B. At least query the Best Practices site available at <http://www.hcfa.gov/other/bestpractices/default.htm> to determine which educational practices are adaptable for their organization and identify material for their Medicare Learning Network sub-domain or their bulletins.
- C. Use of CPT codes on websites must adhere to the following requirements:
- CPT codes and long descriptions can be used on Contractors' Web Site as long as the publication/material does not contain more than 30 percent of a section or subsection of the CPT. If more than 30 percent of a section or subsection of CPT is used, then the contractor's codes and long descriptions must be integrated into narrative text. Of course, contractors are permitted to use CPT codes and CPT code ranges (no long descriptions) without applying the 30 percent. This restriction does not apply to printed material. It only applies to the content of your website, including any video products. Since the restrictions apply to electronic, but not print material, you may need to review and revise any print material when it is posted to your website.
  - The 30 percent restriction on use of CPT long descriptions does not apply if the subsection of the CPT has fewer than 30 codes.
  - No more than 30 percent of the CPT long descriptions may be used for the Anesthesia, Evaluation and Management, and the Pathology and Laboratory sections of CPT for each use (first level section of the heading in the CPT book). The 30 percent subsection limitation is waived for these categories.
  - The AMA copyright must be displayed on the first screen or web page of any CPT, where any CPT is used in publications on the Internet websites and in other electronic media, whether short or long descriptions are used, or only codes or ranges. The copyright notice is:
  - "CPT codes, descriptions and other data only are copyright 1999 American Medical Association (or such other date of publication of CPT). All rights reserved. Applicable FARS/DFARS apply."
  - Contractor Web sites should be designed so that site visitors must acknowledge the terms of the AMA copyright prior to accessing any proprietary CPT material.
  - Contractors must use the point and click license before initial access to any CPT containing HTML pages or prior to each document containing CPT and before each download containing CPT. A statement must also appear on the post-point and click download pages as

per <http://www.hcfa.gov/stats/revdnlod.htm>

- Contractors must use the point and click license on computer-based training modules or web-based courses that function as software and contain CPT codes.
- Contractors must include a shrink wrap license in electronic media containing CPT information that is to be distributed to users outside of their organization. This license need not literally involve “shrink wrap” material rather at a minimum require the user to break a seal (e.g., paper label) to acknowledge acceptance of the terms of the license. The following notice must appear in boldface type in a conspicuous location so that it can be seen prior to opening the media package distributed by the user outside of the contractor:

“Carefully read the following terms and conditions before opening the Electronic Media Package. Opening this package acknowledges your acceptance of these terms and conditions. If you do not agree with these provisions, you should, within a reasonable time, return the Electronic Media Package unused.”

- Bulletins and newsletters posted on the web sites prior to October 1, 2000 need not comply with these instructions as long as the applicable copyright notice is displayed.
- After October 1, 2000, Local Medical Review Policies (LMRPs) posted on the websites that are newly issued or revised must conform to these instructions. (This requirement will be included in MIP activities)
- LMRPs and other non-archival publications posted on the web sites prior to October 1, 2000 must conform to these instructions by October 1, 2001. (This requirement will be included in MIP activities)

- D. Conduct training for provider staff in electronic claims submission including but not limited to activities listed in Productivity Investments; use of Medicare billing and PC-Print software; use of available Medicare EDI transactions; use of new or updated Medicare software released during the year; use of newly introduced EDI standards and/or functions or changes to existing standards or functions.

NOTE: There are multiple sources of funding associated with EDI functions. Please pay particular attention to the notes below to ensure that costs are being attributed to the appropriate activity code.

\* The education of providers on the impact of operation of version 4010 of the ASC X12 standards for the 270/271, 275 (attachments), 276/277, 835, and 837 transactions for HIPAA, and share transaction specification information with providers and their clearinghouses should be billed to Productivity Investments. (The 835 and 837 formats will be updated to version 4010 as part of the annual update under Bills Payment.)

\* The PM-PET function covers the education of providers in group settings rather than contact with individuals. PM-PET costs include newsletters, classes or outreach to groups of providers and their staff on Medicare coverage, billing and benefits of EDI. This does not include costs related to connectivity for individual providers or the resolution of connectivity problems. Similarly, EDI transactions, or interactions with vendors/clearinghouse for the transfer of EDI transactions are not PM-PET costs. EDI specific support is generally supplied by EDI staff but may vary by contractor. If PET-staff also furnish specialized EDI support, the proportion of their time spent furnishing EDI support to individual providers should be charged to Bills Payment.

## VI. Internal Staff Development

- A. Develop open communications with all staff in your organization (including medical review, EDI/Systems and program integrity staff) to ensure that inquiries and shared issues raised by providers are resolved. Encourage participation in provider training related to their areas.

- B. Establish a plan to strengthen the quality of written and verbal correspondence with providers/suppliers. Your plan should include an internal review process and activities to ensure that the quality of your communications is continuously improving. (Please note the related requirements for inquiry reduction or prevention activities, as well as Activity 13006 Provider Telephone Inquiries.)
- C. Develop open communications with staff at all levels in your organization to encourage the development of creative ideas for improving service to providers and improvements to the Medicare program in general. All staff should be encouraged to feed upper management their ideas and suggestions for cost-effective improvements to service. An internal process should be in place whereby improvement ideas are acknowledged and considered. Those ideas deemed unique and cost effective should be included in the Quarterly PSP reports sent to your RO and CO staff. Selected reports will be posted on: <http://www.hcfa.gov/other/bestpractices/default.htm> and may be selected for national implementation.
- D. Implement a developmental plan for training new provider service staff and periodically assessing and training existing staff. Part of the assessment should include random monitoring of calls for accuracy and courtesy. (Note the related requirements for inquiry reduction or prevention activities, as well as Activity 13006 Provider Telephone Inquiries.)

#### VII. Telephone Inquiries

- A. Develop and implement inquiry reduction and prevention activities that are designed to reduce the number of telephone calls for specific high-volume issues. (Please note the related requirements for inquiry reduction and prevention activities, as well as Activity 13006 Provider Telephone Inquiries.) At least quarterly, contractors should query the Best Practices site available at <http://www.hcfa.gov/other/bestpractices/default.htm> to determine which educational practices are adaptable for their organization.

#### VIII. Responsiveness to OIG/GAO Findings

- A. Where possible, incorporate materials that clearly delineate the physician's role in the creation, certification and recertification of the plan of care for home health, and the beneficiary need for partial hospitalization into existing educational activities.

#### IX. Model Release Educational Activities

- A. Perform specialized activities, such as workshops, and bulletins, to educate providers concerning the physician fee schedule.
- B. Inform providers, especially physicians, of the physician certification requirements for ambulance services.

#### X. Submission of Quarterly Report Activity

Outlined below are the specific dates, format and content requirements for the PSP quarterly reports. Plans and quarterly reports sent to Central Office should be addressed to: Center for Health Plans and Providers, Division of Provider Education and Training, Mailstop C4-10-07, 7500 Security Boulevard, Baltimore, Maryland 21244. For ease of review, contractors are requested to provide a narrative summary of activities as well as annotate quantifiable information in a table or spreadsheet format. Please submit this information in chronological order and include a point of contact for each quarterly report.

- A. Due Dates:

- Quarterly Activity Reports are used to recount provider education efforts or activities that occurred or were planned during the preceding quarter. Quarterly Reports are due January 31, 2001 (First Quarter), April 30, 2001 (Second quarter), July 31, 2001 (Third quarter) and October 31, 2001 (Fourth quarter).

B. Format and Content:

- The Quarterly Reports are designed to provide a summary of the quarter's provider education efforts and cite significant activities or accomplishments that occurred. Contractors are asked to include a summary of the most frequently asked questions and areas of concern, and problem areas as determined by claim submission errors and inquiries. Please identify how these areas were, (or will be), addressed by the activities conducted during the previous quarter.
- Please include the date, subject matter, size of audience and location(s) (if applicable), of educational activities conducted through:
  - 1) Publications - Report on regular bulletins, special bulletins or publications that contain provider education materials.
  - 2) Seminars/Conventions/Workshops -Report on all significant events (workshops, conferences, health fairs, *down-links*, etc.) that either fully or partially promoted provider education and in which contractor staff was directly involved.
  - 3) Training Provider Staff on Billing and/or Program Issues.
  - 4) Briefings and Meetings with State Medical Societies and Provider Organizations (including the PET advisory group).
  - 5) Teleconferences.
  - 6) Electronic and Video -Report on significant electronic (Internet, bulletin boards, computer-based training, etc.) and video media efforts involving the dissemination of provider education material.

*XI. Other*

- A. Coordinate with Durable Medical Equipment (DME) Regional Carriers on issues affecting DME suppliers.
- B. Actively solicit feedback related to the Medicare program and contractor service at every opportunity, e.g., tear-off replies in newsletters, feedback sessions at meetings, etc.
- C. Promote utilization of preventive benefits as specified in the Balanced Budget Act of 1997.
- D. Develop and implement effectiveness measure for each educational or training activity. This includes, but is not limited to, such things as customer satisfaction survey instruments, and pre and post-testing at meetings and seminars.
- E. Exercise your capacity to analyze physician/supplier problems and issues and identify and resolve common policy and systems issues.

**DISCRETIONARY PROVIDER EDUCATION ACTIVITIES**

1. Issuance of special bulletins or letters which contain program and billing information. Unless specifically requested by the provider or supplier, eliminate issuance of these items to all providers with no billing

activity in the previous twelve months. Send one bulletin for each provider number, which includes each group number and each individual number within the group. Send one bulletin addressed to the billing manager.

2. Participating in other Medicare contractor conferences on program and billing Issues that did not result from recommendation of the PET advisory group.
3. Presentations at Non-Medicare contractor conferences.
4. Preparation of videos.
5. Issue advisories from the Medical Director to area physicians.
6. Request provider feedback on the effectiveness of Audio Response Units (ARUs). Utilize feedback to make improvements to the ARU system.

## **FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT**

### **Reimbursement (Intermediary)**

#### **Activity Code 16001**

Reimbursement funding for FY 2001 will be at the same level as that of FY 2000. Consequently, FIs should be prepared to perform reimbursement functions at the same level as in FY 2000.

Costs applicable to the review and approval of exception requests are charged to reimbursement through STAR.

Intermediaries should:

1. Closely monitor provider compliance with interim payment requirements, especially those providers reimbursed under the periodic interim payment (PIP) method of reimbursement, and terminate providers from PIP, when necessary, in accordance with 42 CFR 413.64 (h). ( Focus on compliance with instructions issued on July 25,1995 to all FIs regarding monitoring/suspending PIP.)
2. Promptly suspend payments to providers in accordance with 42 CFR 405.370 to help assure the proper recovery of program overpayments and to help reduce the risk of uncollectible accounts.
3. Perform more frequent and enhanced interim rate reviews to assure proper payment to the providers.

#### **Timeliness of Settlements**

HCFA is in the process of revising its expectations for Medicare contractors in the area of cost report audit and settlement activities. HCFA will provide specific instructions to increase the timeliness of cost report settlements. These instructions will also provide guidance and instructions to both Medicare contractors and providers for conducting timely and efficient audits of cost reports. HCFA is proposing that the new process will be effective with cost report audits beginning on or after September 1, 2000.

HCFA's is also expecting that the Medicare contractors should step up their process for auditing terminated providers in a more timely fashion. This means that the audits should be conducted in accordance with program instructions and that the cost report be settled in a timely fashion to ensure that all payments and debts are liquidated as fast as possible.

#### **Workload**

Reimbursement Workload (Workload 1 in CAFMII) is the number of active providers and active entities as defined on the CASR, item 1a.

## **FY 2001 BUDGET AND PERFORMANCE REQUIREMENTS PROGRAM MANAGEMENT**

### **Productivity Investments (Intermediary)**

**Note: The following is provided for intermediary information and planning purposes only. Do not request funding for these projects unless specifically requested to do so. Funding will be distributed or Supplemental Budget Requests solicited when appropriate.**

### **ELECTRONIC DATA INTERCHANGE (EDI)**

See the definition of EDI in the claims payment section. This section designates those activities that we expect to fund as PIs in FY 2001. Specific details and requirements will be included in the implementation instructions upon release.

#### **Standards Activities**

- Support by selected contractors appointed by HCFA for FY 2001 to participate in standards organization workgroups for development, maintenance, review and publication of electronic transaction standards.
- Support by selected contractors appointed by HCFA for FY 2001 to test the attachments standard.
- Make system changes to implement version 4010 of the X12 270/271 and 276/277 standards to comply with HIPAA requirements. (The 835 and 837 formats will be updated to version 4010 as part of the annual update under Bills Payment, but additional provider testing required due to this update will be separately funded through SBRs.) Conduct system compatibility testing with providers and clearinghouses on the implemented HIPAA standard transactions.
- Furnish free/at cost Medicare HIPAA-compliant billing software to providers on request. Rather than individually and independently develop this software however, intermediaries will be strongly encouraged to obtain HIPAA billing software already developed by or for another intermediary, or to partner with other intermediaries to obtain HIPAA-version billing software.
- Educate Medicare providers on the impact of operation of version 4010 of the ASC X12 standards for the 270/271, 275 (attachments), 276/277, 835, and 837 transactions for HIPAA, and share transaction specification information with providers and their clearinghouses so they can make necessary system changes.
- Support from selected contractor appointed by HCFA to conduct a quality review of overall intermediary progress implementing the HIPAA transaction standards.

### **SYSTEMS SECURITY**

HCFA will issue new system security requirements by September 30, 2000.

Required Activities:

- Designate a Medicare Systems Security Coordinator.
- Prepare a comprehensive system security plan based on the forthcoming requirements which addresses: security risk assessment; administrative procedures; physical safeguards; technical services to protect data at rest and; technical mechanisms to protect data in transit. The plan must include remote or contracted facilities e.g., data centers, where Medicare functions are performed or Medicare data is stored and, a senior management certification that the security plan conforms to HCFA requirements.

- Develop a contingency plan designed to recover operations following security attacks or failures. Conduct a test of your contingency plan to assess your organization's capability for executing it.

HCFA and its Independent Verification and Validation contractor (IV&V) will assess each Medicare contractor security plan. Findings may be incorporated in the FY 2001 Contractor Performance Evaluation (CPE).

#### Discretionary Activities:

- Use the services of independent information system security consultants to: conduct risk assessments; prepare or evaluate security plans; to plan or evaluate contingency plan drills.
- Conduct information security technical training for its IT staff and security awareness training for its other employees.
- Acquire hardware and software, as necessary, to address risks identified in the security plan.
- Participate in HCFA- sponsored and/or health care industry best practice forums on information security.

### **CLINICAL DIAGNOSTIC LABORATORY SERVICES**

As a result of a Negotiated Rule Making for Clinical Diagnostic Laboratory Claims new claims processing requirements will be implemented. All intermediaries will be required to implement these new claims processing requirements effective October 1, 2001 (FY 2002). These changes must be accomplished during the fourth quarter of FY 2001. The bill process must be adapted to accommodate the transition that may include changes to local contractor-controlled claims processing systems and related functions.

Training will be necessary in FY 2001 in order to implement effectively the new requirements. Because the rule has not been published, only examples of new requirements can be provided at this time. The new requirements may include; new and clarified documentation and record keeping requirements, new claims processing requirements, and a new definition of date of service. Details on the specifics of what should be covered will be provided later through a program memorandum. This training can be accomplished using bulletins, web page information, training sessions to ensure an effective implementation.

### **AMBULANCE RULE MAKING**

All intermediaries will be required to transition to the new fee schedule over a three-year period. During this three year period the intermediaries will be required to maintain the ability to continue to pay bills on a reasonable cost basis. The payment amount will be blended with the fee schedule provided by HCFA CO over a three-year period. The fourth year payment will be based wholly on the fee schedule. The bill process must be adapted to accommodate the transition and the new fee schedule methodology, which may include changes to local contractor-controlled claims processing systems and related functions.

Intermediaries will be required to provide education for providers (e.g., bulletins, web page information, training sessions) to ensure an effective transition from reasonable cost reimbursement methodology to a fee schedule.

### **DO NOT FORWARD INITIATIVE**

Fiscal Intermediaries (FIs) must modify/develop local software for their individual systems in order to implement this initiative which is effective 1/1/2001. This is a continuation of the effort that began in FY 2000. (See Program Memorandum AB-00-06 "Do Not Forward Initiative", dated 2/2000.)

In addition, FIs are required to use "Return Service Requested" envelopes for all checks mailed to providers, which must comply with postal regulations.

### **INPATIENT REHABILITATION FACILITY PPS**

HCFA has announced the broad direction it will be taking in the development of a prospective payment system (PPS) for inpatient rehabilitation facilities. The Balanced Budget Act of 1997 (BBA) mandates the implementation of the PPS for cost reporting periods beginning on or after October 1, 2000 (moved to 2001, date undetermined). Fiscal Intermediaries (FIs) may request additional funds to modify/develop local software for their individual systems in order to implement this initiative.

Funding will be provided to the FIs for the purposes of education, conferences, conference calls, etc.

### **SNF PPS AND CONSOLIDATED BILLING**

Fiscal Intermediaries (including RHHIs) and Carriers, including DMERCs, may request additional funds to modify and develop local software for their individual systems to implement refinements related to SNF PPS and Consolidated Billing. In addition, FY 2001 funding may be needed to implement the initial Part A consolidated billing requirements if the Agency's Change Request schedule cannot accommodate this activity in FY 2000.

All contractors will be required to provide education for providers (e.g., bulletins, web page information, and training sessions) to ensure proper implementation.

### **STANDARDIZE ELECTRONIC DRUG TRANSACTIONS**

The activity requires that the Medicare contractors make needed systems changes to comply with HIPAA requirements to standardize electronic transactions. Included in these transactions are claims for drugs. Currently, drugs are billed by providers and suppliers using a 5-digit alpha-numeric code called a HCPCS. HIPAA legislation names the National Council for Prescription Drug Programs (NCPDP) as the standard setting organization for the drug code set. The NCPDP Telecommunications Standard Format Version 3.2 specifically identifies as one of the elements, the national drug code (NDC). Therefore, all contractors must be able to accept, process, store, retrieve, archive, update, and pay claims based on the NDC.

### **HOSPITAL WAGE INDEX DATA**

We intend to intensify our wage data audit procedures. In particular, we will require fiscal intermediaries to identify and fully document (through correspondence with the hospitals and HCFA) their effort to correct all substantial errors to the wage index (as identified by HCFA). In some cases, this may require field audits of hospitals supporting documentation to verify that the wage data are accurate.

### **MEDICARE SUMMARY NOTICE**

HCFA will continue implementation efforts associated with the Medicare Summary Notice (MSN) for Medicare contractors. This process requires system changes and the development of an outreach plan for educating the beneficiary and provider communities, and other external entities that may be affected by the issuance of the MSN, such as State Health Insurance Assistance Programs, Peer Review Organizations, etc.

If the contractor has not yet implemented the MSN, the contractor will be identified and notified by HCFA's Customer and Teleservice Operations Group. If the contractor is identified for implementation, it will need to make the necessary system changes and conduct outreach activities in a timely manner. Contractors who have not yet implemented the MSN but are identified for implementation in FY 2001 must submit an outreach plan to the appropriate regional office prior to conducting any outreach activities related to MSN implementation. These contractors should begin outreach activities 90 days prior to the implementation date.

### **HEALTH PLAN IDENTIFIER (PlanID)**

The Health Insurance Portability and Accountability Act (HIPAA) of 1996 requires the Secretary to adopt unique standards for individuals, employers, health plans, and health care providers for use in electronic health care transactions. Based on this requirement, HCFA plans to publish a Notice of Proposed Rule Making (NPRM) in July, 2000 and a final rule in July 2001 in the Federal Register proposing that the PlanID (formerly known as PAYERID) be adopted as the national health plan identifier. The purpose of publishing the NPRM and final rule is to seek additional comments on HCFA's proposed enumerator for health plans and to mandate its use on all electronic transactions specified in HIPAA.

If the PlanID is adopted as the standard by the Secretary, carriers will be required to make changes to their existing systems to send and accept health care transactions with the new standards (PlanID) in lieu of the current alpha-numeric representation of health plans. Final instructions will be issued by February 2001 with a July 1, 2001, implementation date.

### **NATIONAL PROVIDER SYSTEM**

Shared system maintainers' and contractors' activities regarding initial implementation of the National Provider System (NPS) and conducting the test enumeration of all existing Medicare providers. Funding for contractors' activities include provider training and education (sending newsletters and bulletins), using the NPS Standard Record Format, and supporting the test enumeration of all existing Medicare providers. Additional contractor activities will be exploring the use of the NPI in claims processing as well as developing other administrative tasks associated with distributing these unique identifiers (e.g., validating eligibility, communicating with NPS, producing electronic and hardcopy directories, mailings, staffing, etc.).

### **CONTRACTOR TESTING REQUIREMENTS –(ACTIVITY CODE 17022)**

In accordance with HCFA CR 1027, Program Memorandum Transmittal# AB-00-25, dated April 2000, contractors should separately identify and request additional funds (if needed) in their FY2001 Budget Request to meet the requirements for contractor testing. The activity code used to track these funds is 17022. Contractors are required to implement this PM with the January, 2001 systems release.

